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Counsel to Broadway Avenue Investments, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:
SEATON INVESTMENTS, LLC, *et al.*,
Debtors and Debtors In Possession.

- ☐ Affects All Debtors.
- ☐ Affects Seaton Investments, LLC
- ☐ Affects Colyton Investments, LLC
- ☒ Affects Broadway Avenue Investments, LLC
- ☐ Affects SLA Investments, LLC
- ☐ Affects Negev Investments, LLC
- ☐ Affects Alan Gomperts
- ☐ Affects Daniel Halevy
- ☐ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

**AMENDED DECLARATION OF
STEVE BOMBOLA IN SUPPORT OF
MOTION OF DEBTOR AND
DEBTOR IN POSSESSION
BROADWAY AVENUE
INVESTMENTS, LLC FOR ORDER
AUTHORIZING DEBTOR TO
ENTER INTO POST-PETITION
LEASE**

Hearing:

Date: November 19, 2024
Time: 11:00 a.m.
Courtroom: 1368
255 E. Temple Street
Los Angeles, CA 90012

WEINTRAUB ZOLKIN TALERICO & SELTH LLP
11766 WILSHIRE BLVD., SUITE 730
LOS ANGELES, CA 90025

DECLARATION OF STEVE BOMBOLA

I, Steve Bombola, hereby declare as follows:

1. I make this declaration in support of the Debtor's *Motion for Order Authorizing Debtor to Enter into Post-Petition Lease* (the "Motion"). Terms not defined herein shall have the same meanings ascribed to them in the Motion.

2. I am the managing member of Zenith Healthcare Management, LLC ("Zenith"). Zenith is in the business of providing management services to healthcare providers. I have been in the business of providing management services for 4 years. If the Lease is approved by the Bankruptcy Court, Zenith will manage the medical and social services to be provided at the Property, handling all financial aspects of the operations (provided by Levav Group, LLC) including on-site management of personnel, reimbursements from state and federal insurance or other sources of reimbursement for the services to be provided by Levav Group at the Property.

3. Zenith is committed to being a co-tenant on the lease attached as Exhibit A to the Motion (the "Lease"), subject only to the approval of the Bankruptcy Court of the Lease and the \$4 million DIP Loan brought by separate motion to the Bankruptcy Court. Zenith's commitment as a tenant is not contingent upon the application or approval of grants, subsidies, and other government and NGO incentives that may be applied for in connection with the provision of medical and social services at the Property.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 10/23/2024, at newport beach, ca.

DocuSigned by:

Steve Bombola

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STEVE BOMBOLA

DECLARATION VERIFYING SOFTWARE GENERATED SIGNATURE(S)

(Attach this declaration immediately after the signature page of any document that is being Filed and that contains a Software Generated Signature, as those terms are defined in LBR 9011-1(b).)

I, *(print name of declarant)* Derrick Talerico, declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would testify competently hereto. I am over 18 years of age.

2. I am an attorney admitted to practice in this district, or alternatively I am an attorney who has been granted leave to appear pro hac vice per LBR 2090-1.

3. As set forth in the table below, either—

- a. Oral verification: I have obtained oral verification from the following person(s), whose Software Generated Signature (as defined in LBR 9011-1(b)(4)(B)) appear(s) on the accompanying document, that the signer intended to sign this document electronically, or alternatively
- b. Explanation: I provide the following explanation why no such verification is provided (e.g., that the signer is represented by a different attorney who will provide a separate declaration confirming their client's oral verification):

	Name of signer	Date of oral* verification	-OR- Explanation why no verification is provided
1.	Steve Bombola	10/23/2024	<input type="checkbox"/> See explanation below.
2.			<input type="checkbox"/> See explanation below.
3.			<input type="checkbox"/> See explanation below.
4.			<input type="checkbox"/> See explanation below.
5.			<input type="checkbox"/> See explanation below.

Explanation(s) *(if applicable)*:

☐ see attached continuation sheet

***Verification must be oral.** For the avoidance of doubt, verification must be oral, and any written verification is insufficient even if it includes a purported holographic signature, so as to protect against persons who might have access to the hardware and software of the alleged signer and could use such access to create (A) false Software Generated Signatures and (B) false images of holographic signatures purporting to verify those electronic signatures. See LBR 9011-1(b)(4)(B).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/24/2024	Derrick Talerico	/s/ Derrick Talerico
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
11766 Wilshire Blvd, Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled (*specify*): **AMENDED DECLARATION OF STEVE BOMBOLA IN SUPPORT OF MOTION OF DEBTOR AND DEBTOR IN POSSESSION BROADWAY AVENUE INVESTMENTS, LLC FOR ORDER AUTHORIZING DEBTOR TO ENTER INTO POST-PETITION LEASE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) October 28, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF Service List

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 10/28/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See attached US Mail service list

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) October 28, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent Zurzolo (via Priority Mail)
United States Bankruptcy Court
255 E Temple St Suite 1360
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 28, 2024
Date

Martha E. Araki
Printed Name

/s/ Martha E. Araki
Signature

Seaton Investments, LLC – Jointly Administered

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC.: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy:** zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: **Scott R Albrecht:** scott.albrecht@sgsattorneys.com; jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Tanya Behnam:** tbehnam@polsinelli.com; tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Jacquelyn H Choi:** jacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
- Attorneys for Creditor United States of America on behalf of the Internal Revenue Service: **Robert F Conte:** robert.conte@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Archway Real Estate Income Fund I SPE I, LLC: **Michael G. Fletcher, Bruce D. Poltrock, Paige Selina Poupart, Gerrick Warrington:** mfletcher@frandzel.com; ppoupart@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditor Wells Fargo National Bank West: **Todd S Garan:** ch11ecf@aldridgepate.com; TSG@ecf.inforuptcy.com; tgaran@aldridgepate.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Richard Girgado:** rgirgado@counsel.lacounty.gov
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Jacqueline L James:** jjames@hrhlaw.com
- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@eaccidents.com
- Attorneys for Creditor Wells Fargo Bank, N.A.: **Jennifer C Wong:** bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpreion16.la.ecf@usdoj.gov; **Kelly L. Morrison:** Kelly.l.morrison@usdoj.gov

Label Matrix for local noticing
0973-2
Case 2:24-bk-12081-VZ
Central District of California
Los Angeles
Mon Oct 28 14:54:26 PDT 2024

Los Angeles Division
255 East Temple Street,
Los Angeles, CA 90012-3332

Alta Fire Pro
PO Box 7007
Mission Hills, CA 91346-7007

~~Archway Real Estate Income Fund I REIT, LLC
Michael Gerard Fletcher
c/o FRANDZEL ROBINS BLOOM & CSATO, L.C.
1000 Wilshire Boulevard, 19th Floor
Los Angeles, California 90017-2457 NEF PARTY~~

Capital One
PO Box 30285
Salt Lake City, UT 84130-0285

Employment Development Dept
Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA 94280-0001

Halevy Family Trust
Dated September 6 2010
257 S Linden Dr
Beverly Hills, CA 90212-3704

(p)LOS ANGELES COUNTY TREASURER AND TAX COLLE
ATTN BANKRUPTCY UNIT
PO BOX 54110
LOS ANGELES CA 90054-0110

RG Fire Inc
8721 Laurel Canyon Blvd
Sun Valley, CA 91352-2919

Sienna Rose Inc
433 Colyton St
Los Angeles, CA 90013-2210

~~Archway Broadway Loan SPE, LLC
Frاندzel Robins Bloom & Csato, L.C.
c/o Michael Gerard Fletcher
1000 Wilshire Blvd., 19th Fl.
Los Angeles, CA 90017-2457 NEF PARTY~~

802 Mateo Street LLC
Attn Daniel Halevy
802 Mateo St
Los Angeles, CA 90021-1712

~~Archway Broadway Loan SPE, LLC
c/o Michael Fletcher
Frاندzel Robins Bloom & Csato, L.C.
1000 Wilshire Blvd., 19th Fl.
Los Angeles, CA 90017-2457 NEF PARTY~~

CA Dept of Tax and Fee Admin
Account Info Group MIC29
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Sacramento, CA 94279-0029

Commune Events Inc
802 Mateo St
Los Angeles, CA 90021-1712

Franchise Tax Board
Bankruptcy Section MS A-340
PO Box 2952
Sacramento, CA 95812-2952

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

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Woodland Hills, CA 91367-6505

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Los Angeles, CA 90017-3560	11766 Wilshire Blvd
NEF PARTY	Suite 730
	Los Angeles, CA 90025-6577
	FILING ATTORNEY